

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Ivan Blas-Martinez

Martin Blas-Hernandez

Case: 2:23-mj-30399

Assigned To : Unassigned

Assign. Date : 10/2/2023

CMP: USA v BLAS-MARTINEZ, et al. (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 1, 2023 in the county of Wayne in the
Eastern District of Michigan SD, the defendant(s) violated:

Code Section
21 U.S.C. § 841(a)(1) & (b)(1)(A)

Offense Description
Possession with Intent to Distribute Cocaine, a schedule II controlled substance

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 2, 2023

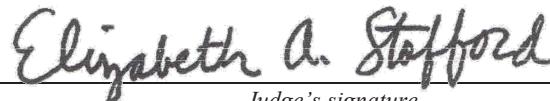
City and state: Detroit, Michigan



Complainant's signature

Daniel Ghareeb, Special Agent, HSI

Printed name and title



Judge's signature

Hon. Elizabeth Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Daniel Ghareeb, being sworn, depose and state the following:

INTRODUCTION

1. This affidavit is in support of a criminal complaint charging Ivan BLAS-MARTINEZ and Martin BLAS-HERNANDEZ with possession with intent to distribute cocaine, a schedule II controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).
2. I am currently a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”) in Detroit, Michigan. I have been a Special Agent with HSI since 2007. Prior to my current assignment, I was a police officer with the North Baltimore Ohio Police Department for approximately two years. I hold a Bachelor and Master of Science in Criminal Justice. I have received specialized training about illegal drug trafficking and money laundering at the Federal Law Enforcement Training Center located in Brunswick, Georgia. I have led and participated in numerous investigations related to illegal drug trafficking as well as methods used to finance drug transactions and launder drug proceeds.

3. I make this affidavit based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all information known to law enforcement pertaining to this investigation.
4. As set forth in more detail below, this investigation has shown that on or about October 1, 2023, Ivan BLAS-MARTINEZ and Martin BLAS-HERNANDEZ attempted to receive cocaine into United States from Mexico via the World Trade Bridge, Port of Entry (POE) in Laredo, Texas. The cocaine was eventually followed from Laredo, Texas, to a warehouse in Wixom, Michigan, located in the Eastern District of Michigan. There is probable cause to conclude BLAS-MARTINEZ and BLAS-HERNANDEZ possessed with an intent to distribute cocaine in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

PROBABLE CAUSE

5. On September 27, 2023, a tractor trailer hauling a yellow trailer bearing Texas temporary license plate 57201228 containing a shipment of plastic bags applied for admission into the United States from Mexico through the

World Trade Bridge, Port of Entry (POE) in Laredo, TX. Upon applying for admission, United States Customs and Border Protection Officers (CBPOs) referred the driver, the tractor, trailer, and the shipment for secondary inspection.

6. During the inspection, CBPOs x-rayed the trailer and observed anomalies within the commodity in the trailer. CBPOs' K-9 alerted to the presence of narcotics within the trailer. Upon inspection, CBPO's extracted a bundle containing a white powdery substance that tested positive for the properties of cocaine. CBPOs utilized the GEMINI, which is a narcotics testing equipment utilized to identify properties of various narcotics.
7. To Track the movement of the trailer effectively and to decrease the chance of detection of law enforcement, agents exercised border search authority and placed a tracking device in the trailer while it was seeking entry at the international border in Laredo, Texas, on September 27, 2023, at approximately 12:30 pm. The tracker was installed in anticipation of receiving a tracking search warrant, which was eventually signed out of the Western District of Louisiana on September 29, 2023. After installation of the tracker, the trailer was allowed to leave the custody of CBP. The

trailer departed the POE, and law enforcement personnel observed it arriving at a warehouse located at 416 Grand Central Boulevard in Laredo, TX.

8. Upon arrival at the yard/warehouse, the driver parked and unhitched the trailer. During this time, law enforcement personnel observed the tractor trailer driver replace the trailer's Texas temporary license plate 5720R28 with temporary license plate 53646SI. The driver subsequently departed the location, leaving the trailer at the yard/warehouse. Law enforcement maintained constant visual on the trailer before and after it was parked.
9. On September 28, 2023, at approximately 1:00 PM, law enforcement personnel observed when the trailer was hitched by a white tractor bearing Texas license plate R59G8956 and transported to a warehouse located at 3805 North Cesar Chavez Road in San Juan, TX. At this location, law enforcement personnel observed the merchandise being offloaded from the yellow trailer and loaded onto a white trailer bearing Maine License Plate 2597G2E, transported by a white tractor bearing Texas license plate R464940 (hereafter, TRACTOR TRAILER).

10. Once the merchandise was loaded onto the TRACTOR TRAILER, it departed the location and started traveling north in furtherance into the United States. Law enforcement personnel has maintained constant physical observation of the TRACTOR TRAILER during its travel.

11. On September 29, 2023, at approximately 12:45 PM, the TRACTOR TRAILER was stopped by the Texas Department of Public Safety in Kingsville, Texas. During the inspection, a bill of lading was presented showing both the consignee and final delivery location as BLS Remodeling Inc. at 48733 West Road, Wixom, Michigan 48393. The description of the goods stated it was black poly sheeting, with a quantity of 600 on 20 pallets.

12. The TRACTOR TRAILER then began traveling north for two days including normal rest stops. On September 30, 2023, at approximately 11:40 PM, The TRACTOR TRAILER arrived at a truck stop in Dexter, Michigan, where it stopped for the night.

13. On October 1, 2023, at, approximately, 7 a.m., the TRACTOR TRAILER arrived at 48733 West Road, Wixom, MI. At 12:07 p.m., a red Dodge Charger arrived at the location. A Hispanic male got out of the Dodge and

made contact with the driver of the TRACTOR TRAILER. The Dodge Charger was occupied by three male suspects who appeared to be Hispanic. After speaking to the driver, the male then opened the garage door for 48749 West Road, Wixom 48393. This was the warehouse next door to the address on the bill of lading. The Hispanic male directed the driver of the TRACTOR TRAILER to back into the garage of the 48749 West Road building. The TRACTOR TRAILER remained backed into the garage for approximately one hour and departed at approximately 1:00 PM.

14. At approximately 1:15 PM, the three males exited the warehouse and attempted to leave before they were arrested by HSI Special Agents. Ivan BLAS-MARTINEZ and BLAS-HERNANDEZ were arrested and transported to Wixom Police Department. BLAS-MARTINEZ and BLAS-HERNANDEZ were read their Miranda statements of rights and subsequently interviewed. BLAS-MARTINEZ stated that he knew that a tractor trailer was headed to Wixom, Michigan, with cocaine hidden within its cargo. BLAS-MARTINEZ stated that he unloaded the TRACTOR TRAILER and placed its contents inside the warehouse. BLAS-

MARTINEZ also stated that he was the lessee of 48749 West Road, Wixom 48393, the warehouse where the cocaine was delivered.

15.BLAS-MARTINEZ additionally stated that he and his father, BLAS-HERNANDEZ unloaded a truck approximately three (3) weeks ago at the same warehouse and that his father used a hand dolly inside the trailer of the truck to bring the pallets to the rear door of the trailer. Once the pallets were brought to the door, BLAS-MARTINEZ would use a forklift to take the pallets off the truck and arrange them on the warehouse floor. BLAS-MARTINEZ stated that during the current unloading (October 1, 2023), his father's hand was injured so his relative came with them to help his father unload the pallets from the trailer. BLAS-MARTINEZ stated that his father, BLAS-HERNANEZ was inside the trailer coordinating with their relative to bring the cocaine laden pallets to the back of the trailer. BLAS-MARTINEZ stated that his father, BLAS-HERNANDEZ, had knowledge that the trailer they were unloading contained cocaine. BLAS-MARTINEZ also stated that he used his father's cellular telephone to coordinate shipments of cocaine with other people.

16. At approximately 5:00 PM search warrant was authorized for the warehouse located at 48749 West Road, Wixom 48393. During the search HSI Special Agents discovered 223 bricks of suspected cocaine. Based on my experience when encountering bricks of cocaine, these bricks weigh at least one (1) kilogram each.

17. Based on my training and experience, the volume of controlled substances and the manner in which they were being transported from Mexico to the United States is indicative of a broader drug trafficking effort that is involved in the further distribution of the controlled substances.

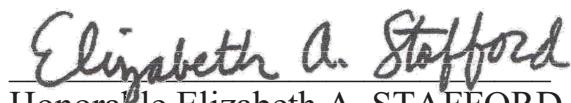
CONCLUSION

18. Based on my experience, drug trafficking organizations transport several million dollars of cocaine in a coordinated manner. Every individual involved in the transportation of cocaine are known to the organization and reimbursed monetarily by the organization. Based on the above, probable cause exists to show that Ivan BLAS-MARTINEZ possessed with the intent to distribute cocaine in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).



Daniel Ghareeb
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me
or by reliable electronic means.



Elizabeth A. STAFFORD
Honorable Elizabeth A. STAFFORD
United States Magistrate Judge